

ROBERT A. DUNN, WSBA No 12089  
ALEXANDRIA T. DRAKE, WSBA No. 45188  
OLIVIA M. JOHNSTON, WSBA No. 62737  
DUNN & BLACK, P.S.  
111 North Post, Suite 300  
Spokane, WA 99201-0907  
Telephone: (509) 455-8711  
Facsimile: (509) 455-8734  
Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

WENDY SCHULLER, an individual,	)	NO. 2:23-cv-00059-
	)	
Plaintiff,	)	<b>DECLARATION OF BARBARA</b>
	)	<b>LUNA</b>
v.	)	
	)	
EASTERN WASHINGTON	)	
UNIVERSITY, a regional university;	)	
and LYNN HICKEY, an individual,	)	
	)	
Defendants.	)	

I, BARBARA LUNA, make this Declaration under penalty of perjury under the laws of the State of Washington:

1. I am over the age of 18, have personal knowledge of and am competent to testify with regard to the matters contained herein.

2. I am a Senior Partner in the accounting and litigation services firm of White, Zuckerman, Warsawsky, Lyna & Hunt, LLP ("White Zuckerman").

DECLARATION OF BARBARA LUNA - 1

**Dunn&Black**  
A Professional Service Corp.  
111 North Post, Suite 300  
Spokane, WA 99201

VOICE: (509) 455-8711 • FAX: (509) 455-8734

1           3. I was retained by Plaintiff to determine and calculate Plaintiff's  
2 economic damages suffered as a result of the termination of Plaintiff's employment  
3 from Defendant Eastern Washington University.

4           4. I expect to testify to the matters discussed in my expert report, as  
5 supplemented and amended, and to provide rebuttal testimony in response to the  
6 opinions and testimony provided by Defendants' experts consistent with the  
7 opinions in my report.  
8

9           5. I reside and perform work for White Zuckerman in Sherman Oaks,  
10 California.  
11

12           6. I have testified as an expert witness in over 500 trials and arbitrations  
13 over 40 years, as well as in 500 depositions during the same time period.  
14

15           7. Over the past six months, I have suffered from multiple serious health  
16 conditions that have unexpectedly substantially limited my ability to travel for trial  
17 in this case and other matters.

18           8. In particular, I have been diagnosed with a heart condition for which  
19 I am expected to undergo surgery later this year in October 2025.  
20

21           9. Additionally, I have had multiple infections affecting my right knee  
22 and right kidney for which I was hospitalized for several weeks this year and was  
23 only recently released.  
24

25  
26 DECLARATION OF BARBARA LUNA - 2

**Dunn&Black**  
A Professional Service Corp.  
111 North Post, Suite 300  
Spokane, WA 99201

VOICE: (509) 455-8711 • FAX: (509) 455-8734

1           10. Due to these conditions, I am concerned that traveling significant  
2 distances is likely to negatively impact my recovery from my knee injury and  
3 exacerbate my other medical conditions shortly before my surgery scheduled for  
4 this October.  
5

6           11. I have sufficient equipment and access to testify effectively by  
7 contemporaneous transmission from my home and/or office in Sherman Oaks,  
8 California.  
9

10           12. I have requested and been permitted to testify remotely without issue  
11 or incident in several other matters this year, including a recent jury trial pending  
12 in Spokane County Superior Court.

13           DATED this 20<sup>th</sup> day of June, 2025, at Sherman Oaks,

14 CA.

15  
16 Barbara Luna  
17 BARBARA LUNA  
18  
19  
20  
21  
22  
23  
24  
25  
26

DECLARATION OF BARBARA LUNA - 3

**Dunn&Black**  
A Professional Service Corp.  
111 North Post, Suite 300  
Spokane, WA 99201

VOICE: (509) 455-8711 • FAX: (509) 455-8734

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 30<sup>th</sup> day of June, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. The CM/ECF system will send notification of such filings to the following:

- Elizabeth Anne Olsen [elizabeth.olsen@atg.wa.gov](mailto:elizabeth.olsen@atg.wa.gov),  
[Sabrina.Mitchell@atg.wa.gov](mailto:Sabrina.Mitchell@atg.wa.gov)

s/ ALEXANDRIA T. DRAKE

ALEXANDRIA T. DRAKE, WSBA No. 45188

ROBERT A. DUNN, WSBA No. 12089

OLIVIA M. JOHNSTON, WSBA No. 62737

Attorneys for Plaintiff

Dunn & Black, P.S.

111 North Post, Suite 300

Spokane, WA 99201-0907

Telephone: (509) 455-8711

Fax: (509) 455-8734

Email: [bdunn@dunnandblack.com](mailto:bdunn@dunnandblack.com)

[adrake@dunnandblack.com](mailto:adrake@dunnandblack.com)